National Historic Landmarks, National Monuments and Memorials

1. Page 121 Pearl Harbor Introduction, paragraph 1: This paragraph ends with the following statement, *The NHL nomination specifically states that the national significance of Pearl Harbor stems from its continuing function rather than its physical facilities and those physical changes required to support this mission are "necessary, normal and expected."* This statement is misleading for the following reasons:

   - The statement was taken out of context. The point of the statements on Section 7, page 2 of the 1974 nomination is that Pearl Harbor was an active naval base at the time of NHL designation in 1964 and remains active to date; and that in order to continue its mission of supporting the fleet changes will occur. The nomination states that "There is no one water or land use, building or structure whose preservation for historic purposes per se takes precedence over the process of change necessary to maintain the support-of-the-fleet mission of Pearl Harbor." This project is not a Navy-driven effort in support of the fleet; and therefore does not fall into the category of "necessary, normal and expected" change to further the mission.
   - The referenced material is from the older 1974 update rather than the later 1978 update, which eliminates the language that elevates mission over preservation (most likely because this is a management decision and not a normal part of NHL documentation).
   - The Historic Assessment Report elevates a statement that down plays the importance of historic resources while excluding information from both the 1974 & 1978 updates that broaden the setting of the district beyond the NHL boundary. The report further excludes the fact that the 1978 update **specifically acknowledges** that more than 300 historic buildings have been "identified as of important to major significance" within the NHL boundary. This uneven representation has created a skewed baseline for assessing the effect of the project on the NHL district (see Section 7 page 1 of the 1974 NHL update).